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14
15 **UNITED STATES DISTRICT COURT**
16 **DISTRICT OF NEVADA**

17 JOHN RAY VELLA,

18)

19 Plaintiff,

20)

21 v.

22)

23 CAROLYN W. COLVIN,

24)

Acting Commissioner of Social Security,

25)

Defendant.

26)

)

Case No.: 2:15-cv-01560-APG-GWF

17 **UNOPPOSED MOTION FOR EXTENSION OF TIME**
18 **(First Request by Defendant)**

19 COMES NOW Defendant Carolyn W. Colvin, Acting Commissioner of Social Security
20 (Defendant), by and through her counsel, Daniel G. Bogden, United States Attorney, and Marla
21 Letellier, Special Assistant United States Attorney, to request that this Court extend the time to
22 respond to Plaintiff's Motion for Remand, which was filed on November 18, 2015, by 30 days from
23 December 21, 2015 to January 20, ~~2015~~²⁰¹⁶. This is Defendant's first request for an extension of time to
24 respond to Plaintiff's Motion. Counsel for Defendant contacted Plaintiff's counsel on December 18,
25 2015, and Plaintiff's counsel responded on December 21, 2015 that he does not oppose Defendant's
26 motion. Defendants' current deadline is December 21, 2015.

1 The instant request is not intended to cause delay and is necessary because counsel for
2 Defendant has been out of the office sick for more than a week, and because of the heavy workload of
3 counsel for Defendant, who is responsible for briefing dispositive motions in seven federal district
4 court cases between December 16, 2015 and January 7, 2016, as well as other agency matters.

5 It is therefore respectfully requested that Defendant be granted a thirty (30) day extension of
6 time to respond to Plaintiff's motion, up to and including January 20, ~~2015~~²⁰¹⁶.

7 Dated: December 21, 2015.

8 Respectfully submitted

9 DANIEL G. BOGDEN
10 United States Attorney

11 /s/ Marla K. Letellier
12 MARLA K. LETELLIER
13 Special Assistant United States Attorney

14 OF COUNSEL:

15 DEBORAH STACHEL
16 Acting Regional Chief Counsel

17 IT IS SO ORDERED:

18 
19 UNITED STATES MAGISTRATE JUDGE

20 DATED: December 22, 2015

CERTIFICATE OF SERVICE

I, Marla Letellier, certify that the following individual(s) were served with a copy of the foregoing **UNOPPOSED MOTION FOR EXTENSION OF TIME** on the date, and via the method of service, identified below:

CM/ECF:

David M. Moore, Esq.
Edward M. Bernstein & Associates
500 S. Fourth St.
Las Vegas, NV 89101
Email: dmoore@edbernstein.com

Dated this 21st day of December, 2015

/s/ Marla K. Letellier
MARLA K. LETELLIER
Assistant United States Attorney